

## **Safety Attribute Inspection (SAI) Data Collection Tool**

### **2.1.3 Distribution (Manuals) (OP)**

#### ***ELEMENT SUMMARY INFORMATION***

**Purpose of This Element** (Certificate Holder's responsibility):

- To ensure the Certificate Holder's manual has policy, instruction and information for the distribution of the manual required by CFR 121.133 to the appropriate flight and ground operations personnel.

**Objective** (FAA oversight responsibility):

- To determine if the Certificate Holder's Distribution (Manuals) process meets all applicable CFR regulatory requirements and FAA policy / guidance material.
- To determine if the Certificate Holder's Distribution (Manuals) process incorporates the System Safety Attributes.
- To identify any shortfalls in the Certificate Holder's Distribution (Manuals) process.

#### ***SUPPLEMENTAL INFORMATION***

**Specific Regulatory Requirement(s) (SRRs):**

- SRRs:
  - 121.135(a)(1)
  - 121.135(b)(1)
  - 121.137(a)
  - 121.137(a)(1)
  - 121.137(a)(2)
  - 121.137(a)(3)

**Related CFR(s) & FAA Policy/Guidance:**

- Related CFRs:
  - 121.135(c)
- FAA Policy/Guidance:
  - 8300.10, Vol.2, Chapter 63
  - 8400.10, Vol.3, Chapter 15

**SAI SECTION 1 – PROCEDURES ATTRIBUTE**

**Objective:** Procedures, instructions and information contained in Certificate Holder's manual are documented methods for accomplishing a process. Policies contained in the Certificate Holder's manual should establish the Certificate Holder's compliance posture. Policies may not be stand-alone statements but may be imbedded within procedures, instructions or information regarding a particular regulatory requirement. The questions in this section of the data collection tool are designed to assist the inspector in determining if the Certificate Holder's manual has documented or prescribed methods of accomplishing the Distribution (Manuals) process requirements that provide answers to the associated who, what, when, where and how type questions. This section of the data collection tool contains policy questions, procedural questions and instructional or informational questions pertaining to various types of Certificate Holder requirements such as actions, prohibitions or resources (i.e., personnel, facilities, equipment, technical data, etc.).

**Tasks**

To meet this objective, the inspector will accomplish the following tasks:

- 1 Review the Specific Regulatory Requirement(s), related CFR(s) and FAA policy/guidance included in the Supplemental Information section of this data collection tool.
- 2 Review the Certificate Holder's manual for policies, procedures, instructions and or information related to the Distribution (Manuals) process to ensure that they contain information on who, what, when, where and how (as appropriate).

**Questions**

To meet this objective, the inspector will answer the following questions:

1. Do written policies, procedures, instructions and information exist to achieve the desired result of the Distribution (Manuals) process (see 1.1 – 1.5 below):
  - 1.1 Does the Certificate Holder's manual contain a general policy stating that it will furnish copies of the manual required by § 121.133 (and the changes and additions thereto) or appropriate parts of the manual to its appropriate ground operations personnel, crewmembers and its appropriate representatives of the Administrator?  
SRRs: 121.135(b)(1); 121.137(a)
 

☐ Yes  
☐ No, Explain
  - 1.2 Does the Certificate Holders manual include instructions and information necessary for personnel concerned to:  
SRRs: 121.135(a)(1)
    - 1.2.1 furnish copies of the manual required by § 121.133 to its appropriate ground operations personnel ?  
SRRs: 121.137(a)(1)
 

*Related Design JTIs:*

      - Check that the Certificate Holder's manual includes instructions and information necessary to allow personnel concerned to perform the duty and responsibility for how they will furnish copies or appropriate parts of the manual to ground operations personnel.

*Sources:* 121.135(a)(1); 121.137(a)(1)  
*Interfaces:* All of 2.1; All of 3.2; 3.1.1–op; 3.1.10–op; 3.1.11–op; 3.1.12–op; 3.1.13–op; 3.1.4–op; 3.1.5–op; 3.1.6–op; 3.1.7–op; 3.1.8–op; 3.1.9–op; 5.1.1–aw; 5.1.5–op

☐ Yes  
☐ No, Explain

<p>1.2.2 furnish copies of the manual required by § 121.133 to its appropriate crewmembers? SRRs: 121.137(a)(2)</p> <p><i>Related Design JTIs:</i></p> <ul style="list-style-type: none"> <li>• Check that the Certificate Holder's manual includes instructions and information necessary to allow personnel concerned to perform the duty and responsibility for how they will furnish copies or appropriate parts of the manual to crew members.</li> </ul> <p>Sources: 121.135(a)(1); 121.137(a)(2) Interfaces: All of 2.1; All of 3.1; All of 3.2</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
<p>1.2.3 furnish copies of the manual required by § 121.133 to its representatives of the Administrator? SRRs: 121.137(a)(2)</p> <p><i>Related Design JTIs:</i></p> <ul style="list-style-type: none"> <li>• Check that the Certificate Holder's manual includes instructions and information necessary to allow personnel concerned to perform the duty and responsibility for how they will furnish copies or appropriate parts of the manual to Representatives of the Administrator.</li> </ul> <p>Sources: 121.135(a)(1); 121.137(a)(3) Interfaces: All of 2.1</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
<p>1.2.4 furnish copies of the the changes to the manual required by § 121.133 to its appropriate ground operations personnel? SRRs: 121.137(a)(1)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
<p>1.2.5 furnish copies of the changes to the manual required by 121.133 to its appropriate crewmembers? SRRs: 121.137(a)(3)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
<p>1.2.6 furnish copies of the changes to the manual required by § 121.133 to its representatives of the Administrator? SRRs: 121.137(a)(3)</p> <p><i>Related Design JTIs:</i></p> <ul style="list-style-type: none"> <li>• Check that the Certificate Holder's manual includes instructions and information necessary to allow personnel concerned to perform the duty and responsibility for how they will furnish copies or appropriate parts of the manual to Representatives of the Administrator.</li> </ul> <p>Sources: 121.135(a)(1); 121.137(a)(3) Interfaces: All of 2.1</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
<p>1.2.7 furnish copies of the additions to the manual required by § 121.133 to its appropriate ground operations personnel? SRRs: 121.137(a)(1)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
<p>1.2.8 furnish copies of the additions to the manual required by § 121.133 to its appropriate crewmembers? SRRs: 121.137(a)(2)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
<p>1.2.9 furnish copies of the additions to the manual required by § 121.133 to its representatives of the Administrator? SRRs: 121.137(a)(3)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

<p>1.3 Does the Certificate Holder's Distribution (Manuals) process comply with the related requirements of 14 CFR Part 121.135? Related CFRs: 121.135(c)</p> <p><i>Related Design JTIs:</i></p> <ul style="list-style-type: none"> <li>• Check that the Certificate Holder's manual includes instructions and information necessary to allow personnel concerned to perform the duty and responsibility for maintaining at least one complete copy of the manual at the principal base of operations. <i>Sources:</i> 121.135(a)(1); 121.135(c) <i>Interfaces:</i> All of 2.1</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
<p>1.4 Does the Certificate Holder's Distribution (Manuals) process comply with the guidance contained in FAA Order 8300.10?</p> <p><i>Related Design JTIs:</i></p> <ul style="list-style-type: none"> <li>• Check that the Certificate Holder's manual system has procedures for distribution of manual revisions to the appropriate manual holders. <i>Sources:</i> 8300.10 Volume 2 Chapter 63 Section 5(c)(2) <i>Interfaces:</i> All of 2.1</li> <li>• Check that the Certificate Holder's manual system has procedures that describe how the distribution of manuals will be controlled. <i>Sources:</i> 8300.10 Volume 2 Chapter 63 Section 2 Paragraph 5(f)(2) <i>Interfaces:</i> All of 2.1</li> <li>• Check that the Certificate Holder's manual system has procedures that describe revision control procedures. <i>Sources:</i> 8300.10 Volume 2 Chapter 63 Section 2 Paragraph 5(f)(2) <i>Interfaces:</i> All of 2.1</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
<p>1.5 Does the Certificate Holder's Distribution (Manuals) process comply with the guidance contained in FAA Order 8400.10?</p> <p><i>Related Design JTIs:</i></p> <ul style="list-style-type: none"> <li>• Check that the certificate holder's manual system contains a revision control page or section from which the user can readily determine if the manual is current. <i>Sources:</i> 8400.10 Volume 3 Chapter 15 Section 1 Paragraph 2085(C) <i>Interfaces:</i> All of 2.1</li> <li>• Check that the certificate holder's manual system contains a system to distribute temporary information or changes, which should not be delayed for the formal revision process. <i>Sources:</i> 8400.10 Volume 3 Chapter 15 Section 1 Paragraph 2085(C) <i>Interfaces:</i> All of 2.1</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
<p>1.6 If alternate procedures exist for use during irregular conditions, do they achieve the same desired results as the primary procedures so that an equivalent level of safety is maintained?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable

<b>SAI SECTION 1 – PROCEDURES ATTRIBUTE</b> <b>–Drop Down Menu</b>	
1. No procedures, policy, instructions or information specified.	
2. Procedures or instructions and information do not identify (who, what, when, where, how).	
3. Procedures, policy or instructions and information do not comply with CFR.	
4. Procedures, policy or instructions and information do not comply with FAA policy and guidance.	
5. Procedures, policy or instructions and information do not comply with other documentation (e.g., manufacturer's data, Jeppesen's Charts, etc.).	
6. Procedures, policy or instructions and information unclear or incomplete.	
7. Documentation quality (e.g., unreadable or illegible).	
8. Procedures, policy or instructions and information inconsistent across Certificate Holder manuals (FOM – Flight Operations Manual to GMM – General Maintenance Manual, etc.).	
9. Procedures, policy or instructions and information inconsistent across media (e.g., paper, microfiche, electronic).	
10. Resource requirements incomplete (personnel, facilities, equipment, technical data).	
11. Other.	

**SAI SECTION 2 – CONTROLS ATTRIBUTE**

**Objective:** Controls are checks and restraints designed into a process to ensure a desired result. The questions in this section of the data collection tool are designed to assist the inspector in determining if checks and restraints are designed into the process to ensure the desired result is achieved. Controls should be written into the manual system to ensure that the most important manual policies, procedures or instructions and information will be complied with.

Controls may be in the form of "administrative controls" which are secondary or supplemental written procedures. Like written procedures, administrative controls also need to provide answers to the associated who, what, when, where and how type questions. Controls may also be in the form of "engineered controls" such as automated features or mechanical actions or devices (i.e., safety devices, warning devices, etc.).

**Tasks**

To meet this objective, the inspector will accomplish the following tasks:

- 1 Review the control questions below.
- 2 Review the Certificate Holder's policies, procedures or instructions and information to gain an understanding of the controls that it has documented.

**Questions**

To meet this objective, the inspector will answer the following questions:

2. Are the following controls built into the Distribution (Manual) process (see 2.1 – 2.8 below):

2.1	Is there a control in place to ensure that copies of required manual are provided to the appropriate ground operations personnel?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
2.2	Is there a control in place to ensure that copies of required manual are provided to the crewmembers?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
2.3	Is there a control in place to ensure that copies of required manuals are provided to the assigned representatives of the Administrator?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
2.4	Is there a control in place to ensure that manual revisions for the required manuals were provided to the appropriate ground personnel?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
2.5	Is there a control in place to ensure that manual revisions for the required manuals were provided to crewmembers?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
2.6	Is there a control in place to ensure that manual revisions for the required manuals were provided to the assigned representatives of the Administrator?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
2.7	Is there a control in place to ensure that applicable portions of the Airplane Flight Manual (AFM) were located on the aircraft?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
2.8	Is there a control in place to ensure that personnel are notified when manual revisions are issued?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
2.9	Does the Certificate Holder have a documented method for assessing the impact of any changes made to the controls in the Distribution (Manuals) process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

<b>SAI SECTION 2 – CONTROLS ATTRIBUTE</b> <b>–Drop Down Menu</b>
1. No controls specified.
2. Documentation for the controls do not identify (who, what, when, where, how).
3. Controls incomplete.
4. Controls could be circumvented.
5. Controls could be unenforceable.
6. Resource requirements incomplete (personnel, facilities, equipment, technical data).
7. Other.

**SAI SECTION 3 – PROCESS MEASUREMENT ATTRIBUTE**

**Objective:** Process measurements are used by the Certificate Holder to measure and assess its processes to identify and correct problems or potential problems and to make improvements to the processes. The questions in this section of the data collection tool are designed to assist the inspector in determining if the Certificate Holder measures or assesses information to identify, analyze and document potential problems with the process. Process measurements are basically a Certificate Holder's internal evaluation or auditing of the most important policies, procedures or instructions and information associated with an element.

To prevent the duplication of work that would otherwise occur, Process Measurements are most commonly addressed through a combination of auditing features contained in both the Certificate Holder's Safety Program/Internal Evaluation Program (for Operations and Cabin Safety related issues) and the auditing function of the Continuous Analysis & Surveillance System (for Airworthiness or Maintenance/Inspection related issues). The Director of Safety and the Quality Assurance Department often work in conjunction to accomplish this function for the Certificate Holder. This approach simply requires amendment of the Safety Program/Internal Evaluation Program audit forms or checklists and the Continuous Analysis & Surveillance System audit forms or checklists to include the specific process measurements for each element.

**Tasks**

To meet this objective, the inspector will accomplish the following tasks:

- 1 Review the process measurement questions below.
- 2 Review the Certificate Holder's policies, procedures or instructions and information to gain an understanding of the process measurements it has have implemented.

**Questions**

To meet this objective, the inspector will answer the following questions:

3. Does the Certificate Holder's Distribution (Manuals) process include the following process measurements (see 3.1 – 3.8 below)?

3.1 Process measurements that would reveal when the Certificate Holder failed to ensure that copies of required manual were provided to the appropriate ground operations personnel?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.2 Process measurements that would reveal when the Certificate Holder failed to ensure that copies of required manual were provided to crewmembers?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.3 Process measurements that would reveal when the Certificate Holder failed to ensure that copies of required manual were provided to the assigned representative of the Administrator?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.4 Process measurements that would reveal when the Certificate Holder failed to ensure that it provided manual revisions for the required manual to the appropriate ground personnel?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.5 Process measurements that would reveal when the Certificate Holder failed to ensure that it provided manual revisions for the required manual to crewmembers?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.6 Process measurements that would reveal when the Certificate Holder failed to ensure that it provided manual revisions for the required manual to the assigned representatives of the Administrator?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain



3.7 Process measurements that would reveal when the Certificate Holder failed to notify personnel when revisions to the required manual were issued?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.8 Process measurements that would reveal when the Certificate Holder failed to ensure that applicable portions of the Airplane Flight Manual (AFM) were located on the aircraft?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.9 Does the Certificate Holder document their process measurement methods and results?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.10 Does the organization that conducts the process measurements have direct access to the person with responsibility for the Distribution (Manuals) process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

<b>SAI SECTION 3 – PROCESS MEASUREMENT ATTRIBUTE</b> <b>–Drop Down Menu</b>	
1. No process measurements specified.	
2. Documentation for the process measurements does not identify (who, what, when, where, how).	
3. Inability to identify negative findings.	
4. No provisions for implementing corrective actions.	
5. Ineffective follow-up to determine effectiveness of corrective actions.	
6. Resources requirements (personnel, facilities, equipment, technical data).	
7. Other.	

**SAI SECTION 4 – INTERFACES ATTRIBUTE**

**Objective:** Interfaces are used by the Certificate Holder to identify and manage the interactions between processes. The questions in this section of the data collection tool are designed to assist the inspector in determining whether or not interactions between the procedures, policies or instructions and information associated with other independent processes within the Certificate Holder's organization are documented. Written procedures, policies or instructions and information that are interrelated and located in different manuals within the Certificate Holder's manual system need to be consistent and complement each other. For the interfaces to be effectively managed, it is not only important to identify what the interfaces are, but it is imperative to document the specific location of the interfaces within the Certificate Holder's manual system.

**Tasks**

To meet this objective, the inspector will accomplish the following tasks:

- 1 Review the interfaces associated with the Distribution (Manuals) that have been identified along with the individual questions in the Procedures Section (1) of this data collection tool.
- 2 Review the Certificate Holder's policies, procedures or instructions and information to gain an understanding of the interfaces that it has documented.

**Questions**

To meet this objective, the inspector will answer the following questions:

NOTE: ALL EXPLANATIONS IN THE DROP DOWN MENU FOR "NO" ANSWERS MUST INCLUDE THE INDIVIDUAL QUESTION NUMBER FROM THE PROCEDURES SECTION (1) OF THIS DATA COLLECTION TOOL AND THE ELEMENT NUMBER OF THE DISCREPANT INTERFACE.

4. Does the Certificate Holder's manual system (See 4.1 and 4.2 below)?

- |   |  |
|---|--|
| 4.1 Recognize and properly address the interfaces that are identified along with the individual questions in the Procedures Section (1) of this data collection tool? | <input type="checkbox"/> Yes<br><input type="checkbox"/> No, Explain |
| 4.2 Document a method for assessing the impact of any changes to the associated interfaces within the Distribution (Manuals)?   | <input type="checkbox"/> Yes<br><input type="checkbox"/> No, Explain |
| 4.3 List any additional interfaces identified:  |  |

<b><i>SAI SECTION 4 – INTERFACES ATTRIBUTE –Drop Down Menu</i></b>
1. No interfaces specified.
2. The following interfaces not identified within the Certificate Holder's manual system:
3. Interfaces listed are inaccurate.
4. Specific location of interfaces not identified within the manual system.
5. Other

## SAI SECTION 5 – MANAGEMENT RESPONSIBILITY & AUTHORITY ATTRIBUTE

**Objective:** The questions in this section of the data collection tool address the responsibility and authority of the process. They are designed to assist the inspector in determining if there is a clearly identifiable, qualified and knowledgeable person who is responsible for the process, is answerable for the quality of the process and has the authority to establish and modify the process. (The person with the authority may or may not be the person with the responsibility.)

### Tasks

To meet this objective, the inspector will accomplish the following tasks:

- 1 Identify the person who has overall responsibility for the Distribution (Manuals) process.
- 2 Identify the person who has overall authority for the Distribution (Manuals) process.
- 3 Review the duties and responsibilities of the person(s), documented in the manual system.
- 4 Review the appropriate organizational chart.

### Questions

To meet this objective, the inspector will answer the following questions:

5. Are the following aspects of the Responsibility and Authority Attribute addressed in the Distribution (Manuals) process (see 5.1 – 5.7 below):

5.1 Is there a clearly identifiable person listed in the Certificate Holder's manual who is responsible for the quality of the Distribution (Manuals)?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain Name/Title: <input type="text"/>
5.2 Is there a clearly identifiable person listed in the Certificate Holder's manual who has authority to establish and modify the procedures, policies or instructions and information for the Distribution (Manuals) process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain Name/Title: <input type="text"/>
5.3 Are the duties & responsibilities of this position clearly and completely documented in the Certificate Holder's manual(s)?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
5.4 Is the authority for this position clearly and completely documented in the Certificate Holder's manual(s)?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
5.5 Are the qualification standards for the person having responsibility for the Distribution (Manuals) process clearly and completely documented?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
5.6 Are the qualification standards for the person having authority to establish and modify the Certificate Holder's procedures, policies or instructions and information for the Distribution (Manuals) process clearly and completely documented?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
5.7 Are the Certificate Holder's procedures for delegation of authority for the Distribution (Manuals) process clearly and completely documented?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

**SAI SECTION 5 – MANAGEMENT RESPONSIBILITY & AUTHORITY ATTRIBUTE  
–Drop Down Menu**

1. Not documented.

2. Documentation unclear.

3. Documentation incomplete.

4. Other.